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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION**

FRIENDS OF ANIMALS,

CASE NO. 1:18-cv-00064-SPW-TJC

Plaintiff,

vs.

**PLAINTIFF'S MOTION TO COMPEL
COMPLETION OF THE
ADMINISTRATIVE RECORD**

RYAN ZINKE, in his official capacity
as Secretary of the United States
Department of Interior; *et al.*,

Defendants.

Pursuant to the Court's November 15, 2018 Order (ECF No. 16), Friends of Animals hereby moves for an order: (1) compelling completion of the administrative record filed by Defendants on September 14, 2018 (ECF No. 12), to include all documents directly or indirectly considered by agency decisionmakers, including all internal and inter-agency memoranda, emails,

communications, documents, revisions, and drafts of documents; and (2) requiring Defendants to produce a privilege log identifying and justifying any claims of privilege for materials that it continues to withhold.

This Motion is necessary because Defendants did not employ the correct standard in compiling the administrative record that it submitted to the Court and erroneously withheld information that should have been included in the administrative record.

Pursuant to Local Rule 7.1(c)(1), counsel for Plaintiff, Friends of Animals, conferred with Defendants' counsel who indicated that they oppose this motion.

This motion is supported by Friends of Animals' brief in support of the motion, which is being filed concurrently with this motion.

Respectfully submitted this 19th day of December, 2018.

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